

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Reading Division**

Kurt Douglass Fritz and
Wendlolyn M. Douglass,

Debtors.

Case No. 25-10081-PMM
Chapter 13

Motion to Extend the Automatic Stay

Debtors Kurt Douglass Fritz ("Debtor 1") and Wendlolyn M. Douglass ("Debtor 2"), through their attorney, moves this Court as follows:

1. The Debtors filed a bankruptcy petition on January 8, 2025. They have yet to file a plan and all schedules, statements, and other documents required by 11 U.S.C. § 521(a)(1) and Fed. R. Bankr. P. 1007(b), but will do so in a timely fashion.
2. The Debtors were involved in one active bankruptcy between January 9, 2024, and January 8, 2025:

Case No.	District	Filed	Dismissed	Reason
23-13016	PAEB	10/05/2023	07/18/2024	Failure to make plan payments

3. Because the Debtors were involved in only one active bankruptcy between January 9, 2024, and January 8, 2025, the automatic stay is set to expire on February 7, 2025. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtors can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).


5. This case was filed in good faith. Debtor 2's cancer diagnosis and treatment directly contributed to the Debtors' failure to make plan payments in the prior case, and she is now in remission. Debtor 1's income has increased since the dismissal of the prior case. And the Debtors plan on pursuing wage orders to secure payment to the Trustee.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtors receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtors' favor if necessary and proper under the law.

Date: January 8, 2025

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